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January 27, 2014

Via Certified Mail

Regional Freedom of Information Officer
U.S. EPA, Region 5
77 West Jackson Boulevard (MI-9J)
Chicago, IL 60604-3590

Re: Freedom of Information Act Request

Dear Sir or Madam,

I represent Plaintiffs Lilly Martin, Jane Gould, Alfredo Mendoza, and Jean Tourville in the case entitled *Martin, et al. v. KCBX Terminals Company, et al.*, Case No. 13-cv-08376 (N.D. Ill.).

This is a request for information under the Illinois Freedom of Information Act, 5 U.S.C. 552, *et seq.*

Definitions

"100th Street Terminal" shall mean the storage transfer terminal located at 3259 East 100th Street, Chicago, Illinois.

"Burley Terminal" shall mean the storage transfer terminal located at 10730 South Burley Avenue, Chicago, Illinois.

"Beemsterboer Terminal" shall mean the storage transfer terminal located at 2900 East 106th Street, Chicago, Illinois.

"Records" shall mean information as defined in 5 U.S.C. 552(f)(2).

"U.S. EPA" shall mean United States Environmental Protection Agency.

Records Requested

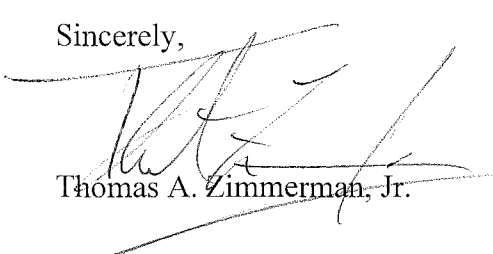
1. All records regarding any inspections of the 100th Street Terminal.
2. All records regarding any inspections of the Burley Terminal.
3. All records regarding any inspections of the Beemsterboer Terminal.
4. All records regarding U.S. EPA findings of violations of regulations or any other laws against KCBX Terminals Company, including notifications of violations.
5. All records regarding U.S. EPA findings of violations of regulations or any other laws against George J. Beemsterboer, Inc., including notifications of violations.
6. All records regarding U.S. EPA findings of violations of regulations or any other laws against KM Railways, LLC, including notifications of violations.
7. All records regarding U.S. EPA findings of violations of regulations or any other laws against DTE Chicago Fuels Terminal, LLC, including notifications of violations.
8. All records regarding U.S. EPA findings of violations of regulations or any other laws against Calumet Transload Railroad, LLC, including notifications of violations.
9. All records regarding U.S. EPA findings of violations of regulations or any other laws against Koch Carbon, LLC, including notifications of violations.
10. All records regarding particulate matter emissions at or near the 100th Street Terminal.
11. All records regarding particulate matter emissions at or near the Burley Terminal.
12. All records regarding particulate matter emissions at or near the Beemsterboer Terminal.
13. All records regarding performance tests (as referenced in 40 CFR 60.8) pertaining to the 100th Street Terminal.
14. All records regarding performance tests (as referenced in 40 CFR 60.8) pertaining to the Burley Terminal.
15. All records regarding performance tests (as referenced in 40 CFR 60.8) pertaining to the Beemsterboer Terminal.
16. All records regarding emission opacity observations or reports pertaining to the 100th Street Terminal.
17. All records regarding emission opacity observations or reports pertaining to the Burley Terminal.
18. All records regarding emission opacity observations or reports pertaining to the Beemsterboer Terminal.

19. All records regarding emission monitoring results pertaining to the 100th Street Terminal.
20. All records regarding emission monitoring results pertaining to the Burley Terminal.
21. All records regarding emission monitoring results pertaining to the Beemsterboer Terminal.
22. All records regarding master metering devices on the equipment used for wet suppression at the 100th Street Terminal.
23. All records regarding master metering devices on the equipment used for wet suppression at the Burley Terminal.
24. All records regarding master metering devices on the equipment used for wet suppression at the Beemsterboer Terminal.
25. Any summaries created or published by the U.S. EPA regarding best management practices for the prevention of fugitive dust.
26. All records of fugitive dust emissions exceeding legal limitations at the 100th Street Terminal.
27. All records of fugitive dust emissions exceeding legal limitations at the Burley Terminal.
28. All records of fugitive dust emissions exceeding legal limitations at the Beemsterboer Terminal.

I understand that the FOIA regulations (40 C.F.R. § 2.104(d)) permit the U.S. EPA to charge fees in connection with this request. I am willing to pay those fees. If electronic copies are available, I would prefer receiving the documents in that format.

I look forward to hearing from you in writing within twenty working days, as required by the Act. *See* 40 C.F.R. § 2.104.

Sincerely,



Thomas A. Zimmerman, Jr.